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June 17, 2014

Jan Palumbo (AWT -121)
United States EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Subject: **Revised Third Quarter 2013 Operations and Monitoring Report**
J.H. Baxter Arlington Facility
Docket No. RCRA-10-2001-0086

Dear Ms. Palumbo:

Please find enclosed one copy of the Revised Third Quarter 2013 Operations and Monitoring Report. A compact disk containing the electronic files is also included. This revised version incorporates United States Environmental Protection Agency (EPA) comments on the report that was originally submitted in February 2014. Baxter's response to EPA's comments are also included with this transmittal letter and report. If you have any questions, please do not hesitate to contact me at (503) 639-3400.

Sincerely,

AMEC Environment & Infrastructure, Inc.

J. Stephen Barnett
Senior Associate

c: Georgia Baxter, J.H. Baxter & Co.
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Response to comments on the letter from EPA to J.H. Baxter dated April 17, 2014

ENVIRONMENTAL PROTECTION AGENCY REGION 10
(EPA) COMMMENTS ON REMEDIAL ACTION PILOT STUDY
REPORT THIRD QUARTER 2013
FORMER J.H. BAXTER & COMPANY WOOD TREATING
FACILITY ARLINGTON, WASHINGTON
APRIL 15,
2014

The EPA has reviewed the Remedial Action Pilot Study Report for the Third Quarter 2013 (dated February 2014) and has the following comments.

GENERAL COMMENTS

1. The reports have not been submitted to EPA on a quarterly basis. For example, the fourth quarter 2012 report came in June, 2013, the first quarter 2013 report came in July, 2013. Then no reports were received again until January, 2014, followed by another one a month later, in February, 2014. No explanation is given of the reason for uneven spacing of the reports. Submit the reports every quarter, unless EPA approves a later submittal date.

   Baxter Response: *Baxter will begin to submit each quarterly report within 90 days of completion of the field sampling effort.*

2. In general the text sections of the report do not include an explanation and evaluation of the data, highlighting what is of importance and different from the previous patterns. Revise the report to include this information in the text, highlighting the information in the tables and figures.

   Baxter Response: *Baxter will include additional information and explanations for differences between quarterly monitoring events in subsequent monitoring reports.*

3. Include discussion in the text about some of the major changes in the concentrations of contaminants at the wells, such as for MW-15, MW-22, MW-23, MW-24, MW-40, and MW-41.

   Baxter Response: *Baxter will include additional information and explanations for differences between quarterly monitoring events in subsequent monitoring reports. The time series plot for well MW-15 was incorrect in the February 2014 submittal – this has been corrected.*

4. Include cross-sections in the report to document the shallow and the deep well contamination. Currently this information is only shown in map views in the reports. Without cross sections it is difficult to understand the relationships of the two plumes to each other in the northwest side of site. Note that EPA has made this request for cross sections in comments on previous Baxter reports. Include cross sections in all future groundwater monitoring reports and revise the current report to include cross sections.

   Baxter Response: *Baxter has included an additional figure in the 3rd Quarter report (and subsequent reports) that displays a cross section along the longitudinal transect of the groundwater plume. The cross section will display water levels and pentachlorophenol concentrations for each quarter.*

SPECIFIC COMMENTS ON FEBRUARY 2014
REPORT

1. **Page 4.** The text states that Figure 6 shows a multi-foot discrepancy in the water elevations, but does not give a clear explanation for it. The discrepancy then occurs again in another sample, again without a clear explanation. Revise the text to provide details about what caused this discrepancy, and why it has occurred more than once.

2. **Page 6, top**. The text states that sample extracts were lost due to evaporation. Include an explanation for why this occurred and how it will be prevented in the future.

   Baxter Response: *As stated in the 3rd Quarter Report, ALS Laboratories was unable to perform the PAH analysis based on a cooling system failure during the sample extraction process at the laboratory. According to the laboratory, this is a rare occurrence and all equipment has been repaired.*

3. **Page 6, second paragraph**. The text states that the "composite sample was prepared by combining an equal volume of groundwater from each extraction well using a measuring cup." Provide an explanation as to why the samples could not be taken from the system while pumping. Also provide a detailed description of how the sampling is performed, including use of multiple containers. Organic contaminants in groundwater samples can adhere to the walls of intermediate collection devices, possibly biasing low affected sample results. The water sample extraction procedures in *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods* (SW-846) include a solvent rinse of the sample container to ensure quantitative transfer of the sample. Below is an excerpt from SW-846:

   > Method 3535A, section 11.1, sample preparation, second paragraph:
   >
   > Secondly, the majority of the organic analytes are hydrophobic and may preferentially adhere to the surfaces of the sample container. For this reason, most extraction methods have traditionally specified that, once the sample is transferred to the extraction apparatus, the sample container should be rinsed with solvent which is added to the apparatus. As a result, it is generally not appropriate to extract only part of the sample from a sample container, e.g., 250 mL from a 1-L sample bottle.

   Baxter Response: *Baxter will modify the sampling approach for future events. Each subsample will be collected in a laboratory-prepared 250 ml or 500 ml glass contained, and submitted to the laboratory under chain of custody. The laboratory will be instructed to combine all subsamples (i.e., one container from each pumping well) and will rinse the individual bottles with solvent to ensure that all analytes are recovered.*

4. **Appendix A**. Figures showing graphs for MW-25 to MW-29, and MW-31 to MW-37 are missing and no reason is given for why they are missing. Revise the report text and figures to include these wells.

   Baxter Response: *The graphs for MW-25 to MW-29, and MW-31 to MW-37 were inadvertently omitted from the report. A revised copy of the report is included with this response letter.*